

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

COMMODITY FUTURES TRADING  
COMMISSION,

Plaintiff,

v.

TRADERS GLOBAL GROUP, INC., a New Jersey corporation, d/b/a “MY FOREX FUNDS”; TRADERS GLOBAL GROUP INC., a Canadian business organization; and MURTUZA KAZMI,

Defendants.

Civil Action No. 3:23-cv-11808

**MOTION FOR ADMISSION  
PRO HAC VICE**

Pursuant to Rule 101.1(c)(1) of the Local Rules of the United States District Court for the District of New Jersey, I, Michael V. Rella, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Thomas Kost  
DAVIS WRIGHT TREMAINE LLP  
920 Fifth Avenue  
Suite 3300  
Seattle, WA 98104  
Tel: (206) 757-8357  
Fax: (206) 757-7357  
Email: ThomasKost@dwt.com

Dated: September 21, 2023  
New York, New York

DAVIS WRIGHT TREMAINE LLP

By: /s/ Michael V. Rella  
Michael V. Rella  
1251 Avenue of the Americas, 21st Floor  
New York, New York 10020  
Phone: (212) 880-3973  
Fax: (212) 489-8340  
Email: MichaelRella@dwt.com

*Attorneys for Non-Party Movant Stripe, Inc.*

**UNITED STATES DISTRICT COURT  
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TRADERS GLOBAL GROUP, INC., a New Jersey corporation, d/b/a “MY FOREX FUNDS”; TRADERS GLOBAL GROUP INC., a Canadian business organization; and MURTUZA KAZMI,

Defendants.

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**CERTIFICATION OF  
MICHAEL V. RELLA IN SUPPORT OF  
MOTION FOR ADMISSION PRO HAC  
VICE**

I, MICHAEL V. RELLA, a member of the bar of this Court, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am an attorney with Davis Wright Tremaine LLP, of counsel for non-party movant Stripe, Inc. in this matter. I make this certification based on my personal knowledge of the facts set forth herein and in support of the motion to admit Thomas Kost *pro hac vice* to represent non-party movant Stripe, Inc.
2. I am a member in good standing of the bars of the States of New Jersey and New York. I am also a member in good standing of the bar of this Court.
3. Thomas Kost is a member in good standing of the bar(s) of the District of Columbia. There are no pending disciplinary proceedings against Mr. Kost in any state or federal court, and no discipline has previously been imposed on Mr. Kost in any jurisdiction. In accordance with the Local Rules, a certified statement of Mr. Kost is attached as “Exhibit A.”
4. I respectfully submit a proposed Order granting the admission of Thomas Kost, *pro hac vice*, attached as “Exhibit B”, hereto.

WHEREFORE, it is respectfully requested that the motion to admit Thomas Kost *pro hac vice* to represent non-party movant Stripe, Inc. in the above-captioned matter be granted.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 21, 2023  
New York, New York

/s/ Michael V. Rella  
Michael V. Rella

# EXHIBIT A

**DECLARATION OF THOMAS KOST**

I, Thomas Kost, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am member in good standing of the bar(s) of the District of Columbia.
2. I was admitted to the bar(s) of the District of Columbia on October 5, 2015. The address of the office maintaining the roll of the members of the bar(s) is: DC Bar, 901 4<sup>th</sup> St., NW, Washington DC, 20001.
3. There are no pending disciplinary proceedings against me in any jurisdiction, and no discipline has previously been imposed on me in any jurisdiction.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 21, 2023

/s/ Thomas Kost  
Thomas Kost

# EXHIBIT B

**UNITED STATES DISTRICT COURT  
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Defendants.

Civil Action No. 3:23-cv-11808

**[PROPOSED] ORDER FOR ADMISSION  
PRO HAC VICE**

Upon the motion of Michael V. Rella, attorney for non-party movant Stripe, Inc and said sponsor attorney’s declaration in support;

**IT IS HEREBY ORDERED** that

Thomas Kost  
DAVIS WRIGHT TREMAINE LLP  
920 Fifth Avenue  
Suite 3300  
Seattle, WA 98104  
Tel: (206) 757-8357  
Fax: (206) 757-7357  
Email: ThomasKost@dwt.com

be admitted to practice *pro hac vice* in the above-captioned case. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys;

**IT IS FURTHER ORDERED** that Thomas Kost pay the annual fee to the New Jersey Lawyers’ Fund for Client Protection in accordance with Local Civil Rule 101.1(c)(2) and New Jersey Court Rule 1:28-2(a);

IT IS FURTHER ORDERED that Thomas Kost pay the sum of \$150.00 to the clerk of the United States District Court in accordance with Local Civil Rule 101(c)(3);

IT IS FURTHER ORDERED that Thomas Kost may file a request with the Clerk of the Court, the form of which is available on the Court's website, for *pro hac vice* counsel to receive electronic notifications in this matter.

So Ordered,

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Hon. Zahid N. Quraishi

**CERTIFICATE OF SERVICE**

I hereby certify that on September 21, 2023, I caused a true and correct copy of the foregoing to be served by electronic means, via the Court's CM/ECF system, on all counsel registered to receive electronic notices. I also certify that I have caused copies of the aforementioned document to be served via first class mail, postage prepaid, upon all non-CM/ECF participants.

/s/ Michael v. Rella  
Michael V. Rella